

September 9, 2005

Mr. John F. Carter Regional Director Federal Deposit Insurance Corporation 25 Jessie Street at Ecker Square San Francisco, California 94105

Re: Comments Regarding FDIC Application #20051977; Wal-Mart Application for Insurance and Industrial Bank Charter

Dear Mr. Carter:

We are writing this letter to oppose the above-referenced application by Wal-Mart. It is our understanding that Wal-Mart is applying for a Utah industrial bank or industrial loan company charter and federal deposit insurance. The issues raised by this application are numerous. Therefore, we will focus on our major concerns in the next paragraphs.

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Last, and perhaps most important, is Wal-Mart's pattern and practice of non-compliance with laws and regulations. The confidence the public has in the banking system is based on reputation. In fact, regulators examine banks on reputation risk. Wal-Mart has been sued by individuals, been the target of class-action suits, and charged by federal agencies with wrong doing. Wal-Mart's former Vice Chairman has been investigated for abusing expense accounts and submitting fraudulent invoices. How do we know this corporate reputation will not trickle down to the industrial bank and then to the Bank Insurance Fund? Under Section 6 of the Federal Deposit Insurance Act the FDIC is required to review insurance applications in light of FDIC standards for management character and fitness. We feel there is enough doubt about the character of management at the holding company level to reject the application for insurance.

In summary, First National Bank and Trust Company of Newtown is opposed to allowing Wal-Mart to obtain insurance from the Bank Insurance Fund for an industrial bank or any other type of charter they may apply for. The current separation of commerce and banking has served this country well in the past and should continue far into the future.

Sincerely,

Don E. Leidy

Vice President &

Senior Mortgage Officer

DEL:mh

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Sincerely,

David E. Foster

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Vice President

DEF:mh

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Sincerely,

Mary L. Schaffer
Board of Director &

Executive Vice President

MLS:mh



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Sincerely,

Donna J. Dunham

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Vice President

DJD:mh

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Sincerely,

Barry L. Pflaeger Jr.

54 - Vice President & Senior Trust Officer

BLP:mh

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Colleen T. Forman Vice President

CTF:mh